

GOOD AFTERNOON, LADIES AND GENTLEMEN. I AM RICK ROTH, PRESIDENT OF ROTH FARMS, INC. I AM A THIRD GENERATION FARMER FROM PALM BEACH COUNTY, FLORIDA. ROTH FARMS HAS PRODUCED FRESH VEGETABLES, SUCH AS RADISHES, LETTUCE, LEAFY VEGETABLES, AND PARSLEY IN THE EVERGLADES AGRICULTURAL AREA NEAR BELLE GLADE FOR OVER 50 YEARS. WE ALSO PRODUCE SUGAR CANE, SOD, RICE, AND NURSERY TREES.

I WANT TO TAKE JUST A MOMENT TO JOIN OTHERS IN WELCOMING YOU TO SUNNY FLORIDA. THIS IS A GREAT DAY. AS PRODUCERS, AND AS CONSUMERS, WE ARE EXCITED ABOUT THE OPPORTUNITIES AND BENEFITS THAT WILL COME FROM THE MANDATORY LABELING OF COUNTRY OF ORIGIN FOR FRUITS, VEGETABLES, AND MEAT PRODUCTS SOLD IN THE UNITED STATES, IN 2004.

I WANT TO MAKE A KEY POINT HERE. THINGS HAVE CHANGED. COOL WAS PASSED BECAUSE PEOPLE WANT TO KNOW WHERE THEIR FOOD COMES FROM. IT IS ALL ABOUT FOOD SECURITY, NOT FARM SECURITY.

I KNOW, ..... WE ARE NOT HER TODAY TO DISCUSS THE MERITS OF COOL. WE ARE HERE TO DISCUSS HOW COOL SHALL BE IMPLEMENTED. USDA'S MISSION IS TO PROVIDE THE INFORMATION REQUIRED BY THE LAW, WHILE MINIMIZING THE BURDEN AND THE COSTS TO PRODUCERS AND RETAILERS. THEREFORE, IT IS IMPERATIVE THAT USDA DO THE FOLLOWING:

- 1) MAXIMIZE THE COMMODITIES TO BE LABELED. NO EXCLUSION FOR MINOR CHANGES TO A PRODUCT
- 2) ALLOW RETAILER FLEXIBILITY IN LABELING COMMODITIES
- 3) ENSURE THAT RETAILERS DO NOT IMPOSE A GREATER BURDEN ON SUPPLIERS THAN REQUIRED BY LAW, SUCH AS AN INDEPENDENT 3<sup>RD</sup> PARTY AUDIT, AS IS BEING SUGGESTED BY SOME RETAILERS.
- 4) UTILIZE EXISTING PAPERWORK TRANSACTIONS ALREADY IN PLACE BETWEEN PACKERS, PROCESSORS, AND RETAILERS.
- 5) REQUIRE THAT FOR BLENDED PRODUCTS THAT ONLY THE COUNTRIES BE LISTED, NOT THEIR PROPORTIONATE PERCENTAGE.

I WANT TO EMPHASIZE ONE POINT THAT I MENTIONED EARLIER. THERE ARE OPPORTUNITIES AND BENEFITS THAT WILL COME FROM MANDATORY COOL, AND THERE ARE THE COSTS.

LABELING CAN BENEFIT CONSUMERS, PRODUCERS, AND RETAILERS DURING TIMES WHEN PRODUCTS, FOREIGN OR DOMESTIC, ARE CAUSING HEALTH PROBLEMS. WHEN FOREIGN PRODUCTS CONTAIN INVASIVE PEST, SEGREGATION OF PRODUCT BY COUNTRY COULD PREVENT TOTAL MARKET DISRUPTIONS.

TODAY, PRODUCERS MARKET THEIR PRODUCTS MUCH DIFFERENTLY THAN JUST A FEW YEARS AGO. FOOD SAFETY, TRACEBACK RECORD-KEEPING, AND OTHER FOOD SECURITY CONCERNS ARE CHANGING HOW WE DO BUSINESS. RETAILERS ARE PUSHING HEALTH AND LIABILITY CONCERNS DOWN TO THE PRODUCER.

I PRODUCE MANY VARIETIES OF LEAFY VEGETABLES, INCLUDING ROMAINE LETTUCE. I HAVE BEEN UNSUCCESSFULLY OFFERING MY BUYERS ROMAINE SLEEVED IN THE FIELD, WHICH WOULD IMPROVE IT'S FRESHNESS, APPEARANCE, AND MARKETABILITY. THIS NEW LABELING BILL, WHEN IT GOES INTO EFFECT, WILL IMMEDIATELY TELL CONSUMERS THAT IT IS GROWN IN THE USA, AND COULD PROVIDE ME WITH AN OPPORTUNITY TO SELL SLEEVED PRODUCT ,,,,,,; WITH A FLORIDA LOGO.

IMPLEMENTING COOL ALONG WITH FOOD SAFETY REGULATIONS ONLY MAKES GOOD COMMON SENSE. IT ALSO GIVES THE PRODUCER ANOTHER OPPORTUNITY TO BETTER MARKET HIS PRODUCT, WHICH CAN ADD VALUE TO HIS PRODUCT. IN FACT, RESEARCH CONDUCTED THIS PAST YEAR BY THE FLORIDA D.A.C.S. SHOWS THAT CONSUMERS ARE WILLING TO PAY MORE FOR PRODUCTS GROWN IN THE USA.

LET ME GIVE YOU ONE MORE EXAMPLE. PALM BEACH COUNTY IS THE #1 PRODUCER OF SWEET CORN IN THE UNITED STATES, WITH SALES APPROACHING \$100 MILLION PER YEAR. OUR MARKETS HAVE GROWN SIGNIFICANTLY, IN PART BECAUSE WE MARKET OUR PRODUCT DIFFERENTLY. OVER 15 YEARS AGO, WE BEGAN SELECTING NEW SWEET CORN VARIETIES FOR A NEW CHARACTERISTIC: TASTE. YOU SEE, IT IS NO LONGER JUST ABOUT YIELDS AND GROWING COSTS. MARKETING IS THE KEY. COOL LABELING WILL HELP, BECAUSE WHERE THE PRODUCT IS GROWN IS A BIG PART OF CREATING OR ENHANCING OUR IDENTITY IN A COMPETITIVE MARKETPLACE.

BY MAKING LABELING RULES WORKABLE AND COST EFFECTIVE, PRODUCERS AND RETAILERS CAN WORK TOGETHER TO BENEFIT THEMSELVES AND CONSUMERS.

I WANT TO THANK USDA AGRICULTURAL MARKETING SERVICES FOR PROVIDING ME THIS OPPORTUNITY TO SPEAK.

RICK ROTH  
ROTH FARMS, INC.  
POB 1300, BELLE GLADE, FL 33430